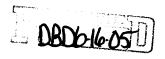


DAN E ARNETT CHIEF OF STAFF

Phone: (803) 737-0800 Fax: (803) 737-0801



June 15, 2005

## VIA U.S. MAIL

Mr. Charles L.A. Terreni Chief Clerk/Administrator South Carolina Public Service Commission 101 Executive Center Dr., Suite 100 Columbia, SC 29210

Re:

Application of Haig Point Utility Company, Inc. for Approval of an

Adjustment in Rates and Charges for Water and Sewer Services

Docket No. 2005-34-W/S

Dear Mr. Terreni:

For your docket, please find enclosed a copy of the Office of Regulatory Staff's Third Continuing Data Request which was served on counsel for Haig Point Utility Company, Inc. Also, if you would please date stamp the extra copy and return it to me via courier.

Please let me know if you have any questions.

Wendy B. Cartledge Wendy B. Cartledge

WBC/rng Enclosures

cc:

G. Trenholm Walker, Esquire

John F. Beach, Esquire

#### **BEFORE**

# THE PUBLIC SERVICE COMMISSION

#### OF SOUTH CAROLINA

#### **DOCKET NO. 2005-34-W/S**

IN RE: Application of Haig Point Utility	)	
Company, Inc for Approval of an	)	OFFICE OF REGULATORY
Adjustment in Rates and Charges	)	STAFF'S THIRD CONTINUING
For Water and Sewer Service	)	DATA REQUEST
	)	
	)	

TO: G. TREHNOLM WALKER, ESQUIRE, ATTORNEY FOR THE APPLICANT, HAIG POINT UTILITY, INC.

#### **INSTRUCTIONS**

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-853 (Supp. 2004), that you answer the following data requests in writing and under oath within ten (10) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, title, and current address and telephone number of the person, and, if his full name is unknown, a complete physical description giving such person's sex, race, approximate age, height, and weight. When asked to identify a document, "identify" means to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and

includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings. As used in this data request, "address" means home address, mailing address, and business address.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

#### IT IS HEREIN REQUESTED:

- A. That all information shall be provided to the undersigned in the format as requested.
- B. That all responses to the requests below be labeled using the same numbers as used herein.
- C. That each of the enumerated data requests be reproduced at the beginning of each of the responses.
- D. That if the requested information is found in other places or in other exhibits, reference not be made to those, but instead, that the information be reproduced and placed in the data request in the appropriate sequence.
- E. That any inquiries or communications relating to questions concerning clarifications of the data requested below be directed to the undersigned.
- F. That all exhibits be reduced to  $8 \frac{1}{2}$ " x 11" format, where practical.
- G. That the requested information be bound in ring binders (loose leaf notebooks) or otherwise suitably bound.
- H. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) responsible for the information contained in each response be indicated.
- I. That the Company provide to the Office of Regulatory Staff two copies of the responses to this data request as soon as possible but no later than ten (10) days after service thereof.

- J. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- K. This data request shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.

#### **QUESTIONS**

- 3.1 How are Haig Point Utility Company's operating deficits financed?
- 3.2 What is the total number of shares and par value of any stock issued for Haig Point Utility Company, Inc. and Haig Point/Melrose Wastewater Treatment Company, Inc.?
- 3.3 What is the legal organizational relationship between Haig Point Utility Company, Inc. and International Paper?
- 3.4 Does Haig Point Utility Company, Inc. receive any funds or financing from Haig Point Utility Company, Inc.), International Paper Company or that flows through Haig Point Utility Company, Inc.?
- 3.5 Is there any independent financial structure of the sewerage operation jointly owned by the Haig Point and Melrose Utilities?
- 3.6 Since Haig Point Utility Company, Inc. has issued no debt, how were the new elevated storage tank and well financed? How has construction been paid for over the years? Has the Company used any Availability Fees for capital improvements?

June 15, 2005

Wendy B, Cartledge Florence P. Belser, Esquire

Wendy B. Cartledge, Esquire

Office of Regulatory Staff

P.O. Box 11263

Columbia, South Carolina 29211

#### **BEFORE**

# THE PUBLIC SERVICE COMMISSION

#### **OF SOUTH CAROLINA**

**DOCKET NO. 2005-34-W/S** 

IN RE: Application of Haig Point Utility Company, Inc. for Approval of an	)	
Adjustment in Rates and Charges	)	CERTIFICATE OF SERVICE
For Water and Sewer Services	)	
	_ )	

This is to certify that I, Rena Grant, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **OFFICE OF REGULATORY STAFF'S THIRD CONTINUING DATA REQUEST** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

G. Trenholm Walker, Esquire

Pratt-Thomas, Epting & Walker, P.A.

Post Office Drawer 22247

Charleston, SC 29413

John F. Beach, Esquire

Ellis Lawhorne & Sims, P.A.

Post Office Box 2285

Columbia, SC, 29202

Rena Huant
Rena Grant

June 15, 2005 Columbia, South Carolina

Phone: (803) 737-0800 Fax: (803) 737-0801

June 15, 2005

# VIA U.S. MAIL

John F. Beach, Esquire Ellis Lawhorne & Sims, P.A. Post Office Box 2285 Columbia, SC, 29202

RE:

Application of Haig Point Utility Company, Inc. for Approval of an

Adjustment in Rates and Charges for Water and Sewer Services

Docket No. 2005-34-W/S

Dear John:

Enclosed please find a copy of the Office of Regulatory Staff's Third Continuing Data Request in the above-referenced matter.

Please let me know if you have any questions.

Sincerely,

Wendy B. Cartledge

Wendy B. Cartledge

WBC/rng Enclosure

cc:

Charles L.A. Terreni



P.O. Box 11263 Columbia, S.C. 29211

June 15, 2005

## VIA U.S. MAIL

G. Trenholm Walker, Esquire **Pratt-Thomas, Epting & Walker, P.A**. Post Office Drawer 22247 Charleston, SC 29413

RE: Application of Haig Point Utility Company, Inc. for Approval of an Adjustment in Rates and Charges for Water and Sewer Services

Docket No. 2005-34-W/S

Dear Mr. Walker:

Enclosed please find a copy of the Office of Regulatory Staff's Third Continuing Data Request in the above-referenced matter.

Please let me know if you have any questions.

Sincerely,

Wendy B. Cartledge
Wendy B. Cartledge

WBC/rng Enclosure

cc: Charles L.A. Terreni